



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 2, 2020

BY ECF AND BY EMAIL

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Danny Bang and Cuong Bang*, 19 Cr. 213 (LJL)

Dear Judge Liman:

The Government respectfully writes, with the consent of both defendants, to request an adjournment of the current June 8, 2020 deadline for motions *in limine* in the above-captioned case. *See* Dkt. 53, 58.

The parties understand from Your Honor's Chambers that a jury trial in this matter is unlikely to proceed in July, in light of the current circumstances surrounding COVID-19 and the attendant complications for jury trials and other matters. In addition, counsel for defendant Cuong Bang has informed the Court that she would be unavailable to conduct any trial (a bench trial or a jury trial) in July, in light of pending trials in other matters with defendants who are in custody. Finally, counsel for defendant Cuong Bang and the Government have been in discussions regarding a potential disposition short of trial in this matter. (As the Court is aware, a change of plea hearing has already been scheduled for June 18, 2020 for defendant Danny Bang. The parties recognize that, should in-person plea proceedings not resume before that time, that date may require adjournment as well.)

In light of the possibility of resolution short of trial, and the unlikelihood that any trial would occur in July in any event, the Government respectfully requests an adjournment *sine die* of the current motions *in limine* deadline, with a deadline for motions *in limine* and any further pretrial submissions required by Rule 7 of this Court's Individual Practices to be set once firm dates have been set for the resumption of jury trials, and the parties and the Court have a clearer sense of when the trial, if any, in this matter is

expected to occur.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: All Defense Counsel (by ECF)

Application Granted.

The motions in limine deadline is adjourned sine die. The trial scheduled for July 6, 2020 is canceled due to COVID-19 circumstances and instead a status conference is set for July 1, 2020 at 12:00PM.

6/4/2020

SO ORDERED.



LEWIS J. LIMAN
United States District Judge